

EXHIBIT A



Nico Banks <nico@bankslawoffice.com>

Re: Subpoena re David Hough et al. V. Ryan Carroll et al., Case No. 2:24-cv-02886

1 message

Nico Banks <nico@bankslawoffice.com>

Mon, Aug 5, 2024 at 3:54 PM

To: "Pradelli, Maria Trinidad" <maria.t.pradelli@jpmchase.com>

Cc: "Carlucci, Carl D" <carl.d.carlucci@jpmchase.com>

Also, you noted that you attempted to call me, but I do not believe I have received a voicemail from you. Can you please let me know your phone number so I can return your call? I do not usually return phone calls from unknown numbers unless they leave a message.

Thanks,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

712 H St NE,

Unit #8571,

Washington, DC 20002

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On Mon, Aug 5, 2024 at 3:51 PM Nico Banks <nico@bankslawoffice.com> wrote:

Maria,

Thank you for your email.

I wanted to fill you in on some background because I've corresponded about this with some other folks at JP Morgan, and it is now the subject of a motion for contempt.

After JP Morgan Chase & Co. received the order denying the motion to quash, it sent me a letter saying that it would only produce documents if the subpoena was re-issued and directed to one of the two subsidiaries that you mentioned.

I had already attempted to amicably resolve that issue with JP Morgan Chase & Co. on many occasions. Specifically, I had noted that I could not specify only one subsidiary because I did not know which subsidiaries custodied the documents I was seeking. Moreover, at least one subsidiary custodying the relevant documents (JP Morgan Payments) is not a part of either of the two subsidiaries you listed. Furthermore, parent companies are required to produce documents held by their wholly owned and controlled subsidiaries, so Plaintiffs are not required to guess which subsidiary has the documents; we are entitled to subpoena the parent company, JP Morgan Chase & Co.

Because JP Morgan was unwilling to have a conversation with me about those issues, I filed the attached motion for contempt and served it on JP Morgan.

Shortly afterwards, on July 18, 2024, I received a voicemail from a JP Morgan representative named Marilyn, who stated that JP Morgan Chase & Co. was now willing to produce documents responsive to the subpoena -- despite that it named the parent company -- and that she was working on the production. We discussed it in follow-up phone conversations. However, to date, I have not received the production of documents.

Regards,

Nico Banks, Esq.
Banks Law Office, P.C.
Pronouns: he/him
Tel.: 971-678-0036
712 H St NE,
Unit #8571,
Washington, DC 20002

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On Thu, Aug 1, 2024 at 3:33 PM Pradelli, Maria Trinidad <maria.t.pradelli@jpmchase.com> wrote:

Mr. Banks,

I'm an in-house counsel at JPMorgan Chase Bank NA. I have been trying to call you re subject subpoena but the voicemail came every time. We recently received an order, compelling JP Morgan Chase & Co to produce certain documents in connection with Civil Action 2:24-cv-02886. Please be aware that this entity is the holding company, therefore, is the incorrect entity to be named and we will not be able to produce due to this error. Could you please re-issue the subpoena outlining the correct entity?

The valid entities will be:

- JPMorgan Chase Bank, N.A. (credit card, depository, checking, savings, mortgage, and loans)
- J.P. Morgan Securities LLC (securities and investments)

Please reply at your earliest convenience to me or my colleague, copied here, Carl Carlucci.

Thank you,

María Trinidad Pradelli (She/Her/Hers) | Associate Counsel | Litigation | Legal | J.P. Morgan Chase & Co. | 955 Belgrano Avenue, 7th Floor, Buenos Aires, C1092AAJ, Argentina | maria.t.pradelli@jpmchase.com

Licensed to practice law in the City of Buenos Aires, Argentina.

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